Robinson+Cole

E. EVANS WOHLFORTH, JR.

666 Third Avenue, 20th floor
New York, NY 10017-4132
Main (212) 451-2900
Fax (212) 451-2999
ewohlforth@rc.com
Direct (212) 451-2954

Admitted in New York
and New Jersey

January 23, 2024

VIA E-Mail

Hon. Freda L. Wolfson, U.S.D.J. (ret.)
Lowenstein Sandler LLP
One Lowenstein Drive
Roseland, New Jersey 07068

Re: ***Johnson & Johnson Health Care Systems, Inc. v. Save On SP, LLC***
       No. 2:22-cv-02632 (JKS) (CLW)

Dear Special Master Wolfson:

Defendant Save On SP LLC ("**SaveOn**") replies to Johnson & Johnson Health Care Systems, Inc. (with its affiliates, "**J&J**")'s January 22, 2024 opposition to SaveOn's January 16, 2024 motion.

In Dkt. 165, SaveOn moved to compel J&J to add "twelve custodians and run *all* agreed-upon or Court-ordered search terms … over their files." Dkt. 165 at 15 (emphasis added). In her November 7 Order, Judge Waldor granted that motion as to six custodians, with no limit on the search terms to be run. Dkt. 173 at 2. J&J now asserts that the Order requires it to run only limited "CAP" search terms for a limited time period. This new position, which J&J did not raise in

Boston | Hartford | New York | Washington, DC | Providence | Miami | Stamford | Wilmington | Philadelphia | Los Angeles | Albany | **rc.com**

Robinson & Cole LLP

Hon. Freda L. Wolfson   Page 2

its motion papers or at the October 30, 2023 discovery conference, is part of a recurring pattern:

J&J insists that SaveOn review massive numbers of documents at breakneck speed; at the same

time, J&J tries to narrow its own document review by minimizing custodians, search terms, and

topics; J&J then demands a prompt end to discovery while it still withholds key materials. The

Court should reject this approach. The Order requires J&J to use all search terms. SaveOn asked

the Court to add these custodians and run all search terms over their files because of compelling

evidence that they were involved in relevant aspects of J&J's business; running narrower terms

over a limited time would omit relevant documents. J&J's arguments are unavailing.

       First, while J&J says that SaveOn sought to add the six custodians at issue solely because

they were involved with the CAP program, Opp. 2-3, SaveOn pointed out in its motion that these

custodians were involved with multiple relevant aspects of J&J's business. *See, e.g.*, Dkt. 165

at 8 (███

██

██

██████████████████), Dkt. 165 at 10 (████████████████████

██

██

████████████████████████████).

       Second, while J&J suggests that SaveOn asked the Court to compel it to run only the

CAP terms for these custodians, Opp. 3, SaveOn plainly asked the Court to compel J&J to run

"***all***" search terms for all requested custodians, not limited terms. Dkt. 165 at 15 (emphasis

added).

Hon. Freda L. Wolfson   Page 3

Third, J&J's assertion that Judge Waldor issued combined relief for SaveOn's motion for

J&J to add custodians (Dkt. 165) and its motion for J&J to run the CAP terms (Dkt. 166) is flatly

incorrect—in the November 7 Order, Judge Waldor decided those separate motions separately.

Dkt. 173 at 2 (addressing Dkt. 165), 2-3 (addressing Dkt. 166). J&J asserts that, in the discovery

conference, after hearing argument on the CAP terms, Judge Waldor asked SaveOn "to confirm

the CAP relief SaveOnSP requested as to the so-called CAP custodians" and SaveOn did not ask

that J&J run all search terms for those custodians. Opp. 4-5 (citing Oct. 30 Tr. at 77:4-17). That

is not what happened. After hearing argument on the CAP terms, the Court asked SaveOn's

counsel, "What else do you want?"; SaveOn's counsel said that it sought nothing else on CAP

terms ("That's what we're seeking on this one"); the Court then moved to the separate topic of

custodians ("What about these seven custodians that we were talking about before?"), on which

separate SaveOn counsel presented argument, *id.* at 77:8-78:20. The Court never asked SaveOn

to "confirm the CAP relief" that it sought for the custodians, J&J never raised the issue, and the

Court never said or suggested that J&J need run only CAP terms for the custodians.

Fourth, in asserting that the custodians do not have unique, relevant documents, J&J tries

to rewrite the discovery rules. Opp. 6. SaveOn cites evidence showing that they were deeply in-

volved with relevant aspects of J&J's business, Dkt. 165 at 7-14; this is more than enough to cre-

ate a fair inference that these J&J employees have unique documents that the CAP terms would

not identify and justify the Court's Order that J&J run all search terms over their documents. *See*

City of Sterling Heights Gen. Emps.' Ret. Sys. v. Prudential Fin., Inc., No. 12-CV-05275 (MCA),

2015 WL 5055241, at *3 (D.N.J. Aug. 21, 2015) (compelling defendants to add up to ten addi-

tional custodians for a total of 76 custodians, given size and scale of the action and the number of

defendant personnel involved). J&J has also produced emails involving these custodians on

Hon. Freda L. Wolfson   Page 4

which other custodians were not copied (the emails were produced only because they were sub-

sequently forwarded to other custodians), *e.g.*, Ex. 6 (JJHCS_00142275), indicating that these

custodians may well have documents that are not in other custodians' files. J&J cannot credibly

assert the contrary, having not reviewed the documents that it intends to exclude.

Fifth, with no substantive response to the documents that SaveOn cites, J&J asks Your

Honor to ignore them. J&J says that SaveOn could have cited some documents in its custodians

motion, Opp. 7—but SaveOn cites them now to show that limiting J&J's searches to the CAP

terms would exclude relevant evidence, Mot. at 3-4, something not at issue in its custodians mo-

tion, as J&J never raised it. J&J notes that it redacted some cited emails for privilege, Opp. 7—

but it does not say that all relevant documents of these non-attorneys are privileged and SaveOn

contests many of J&J's privilege claims, Ex. 9 (Jan. 2, 2024 Ltr. from T. Stone to J. Long). J&J

also notes that SaveOn cites only documents that J&J already produced, Opp. 7—but SaveOn

obviously could not cite documents that J&J withholds, and those documents support SaveOn's

motion.

Finally, J&J accuses SaveOn of delay in its own document production; these accusations

are untrue and irrelevant to this motion.[1] J&J then asks the Court to order SaveOn to substan-

tially complete its refresh production by February 15, 2024. While that request is inappropriate

---

[1] Among other things, J&J suggests that SaveOn is responsible for the Court's order that the parties conduct "refresh" productions because SaveOn purportedly "renounced the parties' previous agreement on a cutoff date and unilaterally insisted that custodial discovery must be carried forward into the present." Opp. 8 (citing Oct. 30 Tr. 97:14-98:2). This is decidedly not so. The parties generally agreed to end document productions on July 1, 2022, but reserved rights to request production past that point as needed. *See, e.g.*, Ex. 10 (Oct. 3, 2023 Ltr. from A. Dunlap to S. Arrow (agreeing to run certain search terms for one custodian for the period July 1, 2022 to October 1, 2023)). Based on evidence of J&J's ongoing CAP program, SaveOn moved the Court to compel J&J to run three CAP-related search terms to the present, Dkt. 166; it did **not** ask that J&J update its entire document production using the full set of search terms that J&J had previously run. At the October 30, 2023 conference, J&J's counsel nevertheless called SaveOn's request "tantamount" to a "wholesale update of our document production," Oct. 30 Tr. 86:2-8, which it was not. Then, having

Hon. Freda L. Wolfson   Page 5

here—in an opposition to a separate motion without any prior notice or attempt to meet and con-

fer—SaveOn would be glad to discuss an appropriate substantial completion deadline that ac-

counts for *all* additional documents that J&J must produce, including from these custodians.

      SaveOn appreciates the Court's attention to this matter.

                  Respectfully submitted,

                  <u>/s/ E. Evans Wohlforth, Jr.</u>
                  E. Evans Wohlforth, Jr.
                  Robinson & Cole LLP
                  666 Third Avenue, 20th floor
                  New York, NY 10017-4132
                  Main (212) 451-2900
                  Fax (212) 451-2999
                  ewohlforth@rc.com

                  David Elsberg (admitted *pro hac vice*)
                  Andrew R. Dunlap (admitted *pro hac vice*)
                  Meredith Nelson (admitted *pro hac vice*)
                  Elizabeth H. Snow (admitted *pro hac vice*)
                  SELENDY GAY ELSBERG PLLC
                  1290 Avenue of the Americas
                  New York, NY 10104
                  (212) 390-9000
                  deslberg@selendygay.com
                  adunlap@selendygay.com
                  mnelson@selendygay.com
                  esnow@selendygay.com

                  Attorneys for Defendant Save On SP, LLC

---

given SaveOn no notice (much less met and conferred), J&J's counsel asked Judge Waldor to compel SaveOn to do
a "full update" of its own production through the present, Oct. 30 Tr. 87:9-18. Simply put: the refresh production came
on J&J's motion, not SaveOn's.

Exhibit 9

Selendy Gay Elsberg PLLC
1290 Avenue of the Americas
New York NY 10104
212.390.9000

\selendy
\gay
\elsberg

Taylor Stone
Associate
212.390.9088
tstone@selendygay.com

January 2, 2023

<u>Via E-mail</u>

Julia Long
Patterson Belknap Webb & Tyler LLP
1133 Avenue of the Americas
New York, NY 10036
jlong@pbwt.com

Re: ***Johnson & Johnson Health Care Systems Inc. v. Save On SP,
       LLC* (Case No. 2:22-cv-02632-ES-CLW)**

Dear Julia,

   We write regarding J&J's October 6, 2023 privilege log.

   First, J&J withholds documents based on attorney-client privilege without
indicating that they involve communications with counsel. For example,
PL000000172 contains a document called ██████████████████████
██
██████████████████████" The author of this document is
Adrienne Minecci, who is not an attorney, and there is no counsel listed. Exhibit 1
contains a list of withheld documents with no indication of counsel involved.
Please produce these documents or provide a detailed basis for J&J's assertion of
attorney-client privilege for each document.

   Second, J&J withholds documents based on attorney-client privilege that
do not appear privileged based on their descriptions. For example, PL000000586
contains a document entitled "████████████████████████████
██████████████ This document was not authored by attorneys and its name
does not indicate that it contains legal advice. J&J also withheld documents for
which it apparently could have redacted any privileged information instead of
withholding the documents in full. For example, PL000000552 contains a docu-
ment entitled "██████████████████████████████████████ It
is implausible that this document, which the parent email indicates is new hire
training material, consists solely of legal advice. Exhibit 2 contains a list of docu-
ments that appear to be entirely or partially non-privileged. Please produce these

documents (with redactions if warranted) or provide a detailed basis for J&J's assertion of attorney-client privilege over each document or redaction.

Third, J&J withholds 131 calendar invites under either attorney-client privilege or work product doctrine. *See, e.g.*, PL000000008, PL000000398, PL000000820–21, PL000001084. The invites are not subject to the attorney-client privilege: Even if the purpose of the meetings was to provide legal advice, general facts such as the time of or participants in those meetings are not privileged. *See* N.J. R. Evid. § 504 (stating that the privilege applies to "communications," not surrounding facts). The invites also do not qualify for work product doctrine, as there is no indication that they were prepared predominantly for use in litigation. Exhibit 3 contains a list of these calendar entries. Please produce them or provide a detailed basis for J&J's privilege assertions over each document.

Fourth, J&J failed to provide a privilege log for documents it produced with redactions. J&J agreed to produce its privilege log on October 6, 2023, *see e.g.*, Aug. 31, 2023 Letter from J. Long to M. Nelson, and never stated that it would exclude documents redacted for privilege; SaveOn agreed to produce its privilege log on the same date, *see e.g.*, Sept. 13, 2023 Letter from M. Nelson to J. Long, and its log included redacted documents. All assertions of privilege must be justified by a specific explanation, including a presentation of "factual grounds and legal analyses." *Seacoast Builders Corp. v. Rutgers*, 358 N.J. Super. 524, 542 (App. Div. 2003). J&J failed to provide any justification for its privilege redactions, many of which appear inappropriate. *See, e.g.*, JJHCS_00112943 (redacting all substantive content in ██, none of whom are attorneys); JJHCS_00105491 (redacting what appears to be a ████████████████████████████████ to several non-attorneys with no attorneys on the chain); JJHCS_00114204 (redacting an █████████ ██); JJHCS_00113376 (redacting all substantive content in an email thread, part of which appears to be ████████████████). Please update your privilege log to include all documents redacted for privilege.

Fifth, J&J appears to inappropriately assert the attorney work product doctrine for many documents. This doctrine protects the confidentiality of papers prepared by, or on behalf of, attorneys in anticipation of litigation. Fed. R. Civ. P. 23(b)(3)(A). J&J asserts this privilege relating to this litigation, filed in May 2022, for documents starting in 2017, *see, e.g.*, rows PL000000037–38, 48, and continuing to late 2021. *See, e.g.*, rows PL000000883, 0981, 1024, 1045, and 2738. While J&J notes that the documents "provide[] information necessary for counsel to render legal advice regarding current litigation," *id.*, the work product doctrine does not apply retroactively to documents created before litigation was reasonably anticipated. *See Rivard v. Am. Home Prod., Inc.*, 391 N.J. Super. 129, 155 (App. Div. 2007). Exhibit 4 contains a list of documents withheld solely on the basis of the work product privilege that likely date from before J&J anticipated this litigation. Please (1) state the date on which J&J first anticipated this litigation; and (2)

Julia Long
January 2, 2023

produce all documents before that date for which J&J currently asserts only the work produce privilege.

       Sixth, J&J withholds or redacts documents based on attorney-client privilege where the privilege appears to have been waived ████████████████████ ██ ████████████████████ *See, e.g.*, JJHCS_00121527-51 (██████████████████████ █████████); JJHCS_00035175-80 (████████████ ████████ █████████); JJHCS_00122617-22 (████████████ █████████ █████████ ███████); JJHCS_00112043-47 (██████████ ████████ ████████ ███ ██████); JJHCS_00111939 (████████████████████████); JJHCS_00026849 (██████████████████████████████). Communication made voluntarily with a "non-privileged" person breaks the attorney-client privilege. *See Ashland Inc. v. G-I Holdings Inc.*, 2019 WL 1552750 (N.J. Super. Ct. App. Div. Apr. 10, 2019). The party claiming the privilege must show in a non-conclusory fashion why the privilege should apply. *Rivard*, 391 N.J. Super at 152. Exhibit 5 contains a list of these documents. Please produce these documents or explain in detail why any privilege in the documents was not waived by disclosure to a third party.

       We request a response and production of all documents requested herein by January 9, 2023. We reserve all rights and are available to meet and confer.

Regards,

/s/ Taylor Stone

Taylor Stone
Associate

3

Julia Long
January 2, 2023

Exhibit 1

Documents with no counsel listed:

PL000000043	PL000000044	PL000000049	PL000000096
PL000000098	PL000000099	PL000000100	PL000000133
PL000000168	PL000000170	PL000000171	PL000000172
PL000000176	PL000000177	PL000000222	PL000000223
PL000000226	PL000000227	PL000000230	PL000000231
PL000000239	PL000000240	PL000000241	PL000000243
PL000000244	PL000000245	PL000000246	PL000000256
PL000000271	PL000000272	PL000000273	PL000000274
PL000000275	PL000000290	PL000000291	PL000000295
PL000000313	PL000000314	PL000000349	PL000000376
PL000000386	PL000000394	PL000000456	PL000000457
PL000000520	PL000000521	PL000000524	PL000000637
PL000000714	PL000000762	PL000000763	PL000000850
PL000000904	PL000000905	PL000000906	PL000000907
PL000000947	PL000002729	PL000000961	PL000000966
PL000000968	PL000000998	PL000001000	PL000001001
PL000001004	PL000001005	PL000001006	PL000001007
PL000001018	PL000001022	PL000001063	PL000001064
PL000001065	PL000001071	PL000001105	PL000002762
PL000001123	PL000001128	PL000001129	PL000001132
PL000001133	PL000001167	PL000001176	PL000001177
PL000001178	PL000001241	PL000001242	PL000001258
PL000001262	PL000001265	PL000001266	PL000001267
PL000001268	PL000001379	PL000001418	PL000002766
PL000001422	PL000001520	PL000001522	PL000001549
PL000001550	PL000001556	PL000001557	PL000001611
PL000001612	PL000001613	PL000001614	PL000001630
PL000001631	PL000001628	PL000001629	PL000001632
PL000001709	PL000001711	PL000001721	PL000001727
PL000001728	PL000001729	PL000001730	PL000001757
PL000001758	PL000001783	PL000001784	PL000001785
PL000001852	PL000001901	PL000001903	PL000001906
PL000001907	PL000001990	PL000001991	PL000002791
PL000002792	PL000002793	PL000002794	PL000002795
PL000002796	PL000002797	PL000002798	PL000002799
PL000002800	PL000002801	PL000002802	PL000002012
PL000002015	PL000002017	PL000002020	PL000002021
PL000002018	PL000002019	PL000002030	PL000002031
PL000002038	PL000002039	PL000002051	PL000002052
PL000002053	PL000002054	PL000002411	PL000002488
PL000002610	PL000002666	PL000002664	PL000002665
PL000002725			

4

Julia Long
January 2, 2023

Exhibit 2

Documents that appeared non-privileged based on description:

PL000000001	PL000000002	PL000000004	PL000000014
PL000000033	PL000000034	PL000000061	PL000000062
PL000000097	PL000000173	PL000000380	PL000000382
PL000000383	PL000000414	PL000000420	PL000000423
PL000000424	PL000000426	PL000000427	PL000000428
PL000000430	PL000000431	PL000000505	PL000000506
PL000000552	PL000000554	PL000000555	PL000000556
PL000000584	PL000000585	PL000000586	PL000000587
PL000000671	PL000000698	PL000000735	PL000000736
PL000000738	PL000000775	PL000000833	PL000000857
PL000000858	PL000000861	PL000000862	PL000000867
PL000000868	PL000000869	PL000000870	PL000000871
PL000000872	PL000000918	PL000000925	PL000000926
PL000000935	PL000000950	PL000000965	PL000001021
PL000001046	PL000001060	PL000001061	PL000001075
PL000001291	PL000001323	PL000001324	PL000001538
PL000001551	PL000001552	PL000001657	PL000001658
PL000001722	PL000001744	PL000001780	PL000001781
PL000001782	PL000001795	PL000001872	PL000001876
PL000001892	PL000001977	PL000001992	PL000001994
PL000001995	PL000001996	PL000002000	PL000002001
PL000002014	PL000002242	PL000002259	PL000002269
PL000002308	PL000002776	PL000002788	PL000002789
PL000002790	PL000002803	PL000002804	PL000002805

5

Julia Long
January 2, 2023

Exhibit 3

Calendar Entries:

PL000000008	PL000000396	PL000000398	PL000000682
PL000000820	PL000000821	PL000000829	PL000000830
PL000000943	PL000000945	PL000001084	PL000001087
PL000001109	PL000001142	PL000001143	PL000001145
PL000001146	PL000001148	PL000001152	PL000001153
PL000001154	PL000001155	PL000001156	PL000001157
PL000001158	PL000001159	PL000001212	PL000001213
PL000001215	PL000001216	PL000001217	PL000001229
PL000001253	PL000001257	PL000001259	PL000001263
PL000001270	PL000001290	PL000001292	PL000001293
PL000001305	PL000001306	PL000001530	PL000001538
PL000001562	PL000001589	PL000001590	PL000001609
PL000001615	PL000001616	PL000001617	PL000001621
PL000001622	PL000001706	PL000001900	PL000001913
PL000001919	PL000001920	PL000001922	PL000001923
PL000001924	PL000001926	PL000001927	PL000001933
PL000001934	PL000001935	PL000001936	PL000001938
PL000001941	PL000001942	PL000001950	PL000001951
PL000001952	PL000001953	PL000001955	PL000001956
PL000001961	PL000001962	PL000001965	PL000001966
PL000001967	PL000001968	PL000001969	PL000001970
PL000001971	PL000001972	PL000002007	PL000002057
PL000002081	PL000002082	PL000002083	PL000002088
PL000002089	PL000002117	PL000002119	PL000002120
PL000002122	PL000002191	PL000002250	PL000002252
PL000002470	PL000002471	PL000002472	PL000002478
PL000002515	PL000002555	PL000002556	PL000002558
PL000002565	PL000002568	PL000002570	PL000002587
PL000002591	PL000002592	PL000002593	PL000002613
PL000002616	PL000002667	PL000002668	PL000002669
PL000002670	PL000002675	PL000002676	PL000002680
PL000002681	PL000002685	PL000002689	PL000002695
PL000002698	PL000002700	PL000002750	

6

Julia Long
January 2, 2023

Exhibit 4

Documents withheld on the basis of the work product doctrine before JJHCS likely anticipated this litigation:

PL000000037	PL000000038	PL000000048	PL000000051
PL000000104	PL000000204	PL000000224	PL000000229
PL000000234	PL000000242	PL000000263	PL000000264
PL000000279	PL000000387	PL000000392	PL000000393
PL000000401	PL000000455	PL000000483	PL000000484
PL000000519	PL000000609	PL000000789	PL000000815
PL000000882	PL000000883	PL000000962	PL000000971
PL000000972	PL000000981	PL000001024	PL000001030
PL000001045	PL000001048	PL000001050	PL000001058
PL000001079	PL000001086	PL000001088	PL000001096
PL000001100	PL000001108	PL000001109	PL000001110
PL000001113	PL000001118	PL000001119	PL000001120
PL000001121	PL000001122	PL000002734	PL000002735
PL000002736	PL000002737	PL000002738	PL000002739
PL000002740	PL000002741	PL000002744	PL000002746
PL000002748	PL000002749	PL000002761	PL000002763

Julia Long
January 2, 2023

Exhibit 5

Documents disclosed to third parties:

PL000000017	PL000000025	PL000000026	PL000000027
PL000000028	PL000000029	PL000000031	PL000000032
PL000000052	PL000000053	PL000000055	PL000000065
PL000000069	PL000000079	PL000000080	PL000000083
PL000000084	PL000000086	PL000000087	PL000000088
PL000000089	PL000000090	PL000000093	PL000000094
PL000000095	PL000000102	PL000000103	PL000000105
PL000000106	PL000000107	PL000000108	PL000000109
PL000000110	PL000000115	PL000000116	PL000000117
PL000000118	PL000000124	PL000000125	PL000000131
PL000000137	PL000000287	PL000000288	PL000000289
PL000000304	PL000000305	PL000000307	PL000000308
PL000000309	PL000000310	PL000000311	PL000000312
PL000000316	PL000000322	PL000000323	PL000000331
PL000000332	PL000000333	PL000000334	PL000000335
PL000000336	PL000000337	PL000000338	PL000000359
PL000000364	PL000000370	PL000000377	PL000000381
PL000000388	PL000000389	PL000000407	PL000000421
PL000000429	PL000000432	PL000000433	PL000000434
PL000000435	PL000000436	PL000000437	PL000000465
PL000000466	PL000000467	PL000000468	PL000000469
PL000000470	PL000000471	PL000000472	PL000000475
PL000000476	PL000000477	PL000000478	PL000000479
PL000000480	PL000000485	PL000000617	PL000000631
PL000000632	PL000000633	PL000000634	PL000000798
PL000000800	PL000000801	PL000000808	PL000000809
PL000000823	PL000000824	PL000000825	PL000000834
PL000000835	PL000000836	PL000000837	PL000000838
PL000000839	PL000000842	PL000000843	PL000000888
PL000000902	PL000000955	PL000000956	PL000000983
PL000000990	PL000000991	PL000000992	PL000000993
PL000000994	PL000000995	PL000000996	PL000000997
PL000001013	PL000001019	PL000001025	PL000001026
PL000001027	PL000001028	PL000001031	PL000001032
PL000001037	PL000001038	PL000001040	PL000001049
PL000001056	PL000001081	PL000001082	PL000001130
PL000001131	PL000001164	PL000001188	PL000001189
PL000001199	PL000001207	PL000001240	PL000001289
PL000001307	PL000001313	PL000001316	PL000001317
PL000001343	PL000001344	PL000001345	PL000001352
PL000001353	PL000001417	PL000001427	PL000001431
PL000001443	PL000001456	PL000001459	PL000001478

8

Julia Long
January 2, 2023

PL000001479	PL000001490	PL000001491	PL000001492
PL000001521	PL000001526	PL000001527	PL000001528
PL000001537	PL000001558	PL000001559	PL000001610
PL000001636	PL000001637	PL000001660	PL000001667
PL000001678	PL000001679	PL000001680	PL000001681
PL000001682	PL000001684	PL000001685	PL000001687
PL000001692	PL000001693	PL000001694	PL000001695
PL000001696	PL000001701	PL000001718	PL000001740
PL000001745	PL000001746	PL000001747	PL000001749
PL000001750	PL000001751	PL000001759	PL000001847
PL000001848	PL000001849	PL000001850	PL000001853
PL000001854	PL000001858	PL000001864	PL000001865
PL000001867	PL000001868	PL000001869	PL000001870
PL000001874	PL000001877	PL000001879	PL000001891
PL000001908	PL000001909	PL000001916	PL000001917
PL000001925	PL000001928	PL000001929	PL000001930
PL000001931	PL000001973	PL000001974	PL000001984
PL000001993	PL000002032	PL000002040	PL000002126
PL000002127	PL000002132	PL000002198	PL000002292
PL000002296	PL000002297	PL000002298	PL000002299
PL000002300	PL000002303	PL000002306	PL000002307
PL000002313	PL000002319	PL000002340	PL000002370
PL000002424	PL000002658	PL000002770	PL000002780

Exhibit 10

CONFIDENTIAL – FILED UNDER SEAL